

JESSE A. BUSS, OSB No. 122919
WILLAMETTE LAW GROUP
411 Fifth Street
Oregon City OR 97045-2224
Tel: 503-656-4884
Fax: 503-608-4100
Email: jesse@WLGpnw.com

Attorney for Plaintiffs
COMMITTEE TO RECALL DAN HOLLADAY,
JEANA GONZALES, and ADAM MARL

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

**COMMITTEE TO RECALL DAN
HOLLADAY, JEANA GONZALES, and
ADAM MARL,**

Plaintiffs,

vs.

KATTIE RIGGS, City Recorder for Oregon
City, in her official capacity,

Defendant.

Case No. 3:20-cv-01631-YY

**JOINT PROPOSED INITIAL
CASE MANAGEMENT
SCHEDULE**

The parties have filed an agreement waiving the initial discovery disclosures set forth in the Federal Rules of Civil Procedure. ECF No. 14; *see* Fed. R. Civ. P. 26(a)(1). Although the parties' full conference under Fed. R. Civ. P. 26(f) is not yet due, the parties have conferred and agreed upon a joint proposed initial case management schedule, as set forth herein. Additionally, because the successful intervention of the State of Oregon is anticipated, counsel for the State

participated in the parties' initial conference. As used herein, the term "parties" refers to plaintiffs, defendant, and the State. All parties join in this proposed initial schedule, as indicated by their signatures below.

It is too early in the case to propose a complete case management schedule, so this proposed schedule only includes deadlines applicable up to and through the briefing of defendant's and the State's anticipated motion(s) to dismiss plaintiffs' complaint. The parties have conferred and propose the following initial case management schedule:

- March 4, 2021: Deadline for the State to file its motion to intervene.
- March 11, 2021: Deadline for plaintiffs to file an amended complaint and/or move the court to allow a supplemental complaint.
- March 25, 2021: Deadline for defendant and/or the State to file motion(s) to dismiss and/or for the defendant to file a responsive pleading.
- April 22, 2021: Deadline for plaintiffs to respond to defendant's and/or the State's motion to dismiss (if any is filed).
- May 6, 2021: Deadline for defendant and the State to reply to plaintiffs' response.

To the extent the above schedule reflects a modification of the current due date(s) for defendant's and/or the State's responsive pleadings, the parties hereby jointly request an extension of time conforming to the above schedule.

Once defendant's and the State's motion(s) to dismiss are resolved by the court, the parties will confer about a subsequent case management schedule and will file a joint proposed schedule within 14 days.

Respectfully submitted this 24th day of February 2021.

s/ Jesse A. Buss

Jesse A. Buss, OSB # 122919
Willamette Law Group
411 Fifth Street
Oregon City OR 97045-2224
Tel: 503-656-4884
Fax: 503-608-4100
Email: jesse@WLGpnw.com

*Attorney for Plaintiffs Committee to Recall Dan Holladay,
Jeana Gonzales, and Adam Marl*

s/ Kevin S. Mapes

Kevin S. Mapes, OSB # 020079
Bateman Seidel Miner Blomgren Chellis & Gram, PC
1000 SW Broadway, Ste. 1910
Portland OR 97205
Tel: 503-972-9917
Fax: 503-972-9921
Email: kmapes@batemanseidel.com

Attorney for Defendant Kattie Riggs

s/ Brian Simmonds Marshall

Brian Simmonds Marshall, OSB # 196129
Senior Assistant Attorney General
Trial Attorney
Oregon Department of Justice
Trial Division, Special Litigation Unit
100 SW Market Street
Portland OR 97201
Tel: 971-673-1880
Fax: 971-673-5000
Email: Brian.S.Marshall@doj.state.or.us

*Of Attorneys for Proposed-Intervenor
State of Oregon*

CERTIFICATE OF SERVICE

I certify that on February 24, 2021 I served the foregoing JOINT PROPOSED INITIAL CASE MANAGEMENT SCHEDULE upon the parties hereto by the method indicated below, and addressed to the following:

Kevin S. Mapes
Bateman Seidel Miner Blomgren Chellis & Gram, PC
1000 SW Broadway, Ste. 1910
Portland OR 97205
kmapes@batemanseidel.com

Of Attorneys for Defendant Kattie Riggs

Brian Simmonds Marshall, OSB # 196129
Senior Assistant Attorney General
Trial Attorney
Oregon Department of Justice
Trial Division, Special Litigation Unit
100 SW Market Street
Portland OR 97201
Brian.S.Marshall@doj.state.or.us

Of Attorneys for Proposed-Intervenor State of Oregon

by electronically transmitting the attached document(s) to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

s/ Jesse A. Buss
Jesse A. Buss, OSB No. 122919
Attorney for Plaintiffs